



Integrated System for the Management of Health, Safety & Environment

Integrated Management System Part 2:

Section 1: Policies and Statements

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2.1.01 Health, Safety & Environment Policy Statement

It is the objective of the company to achieve sustained, profitable growth by providing services, which consistently satisfy the needs and expectations of our customers, and to maintain, develop and improve the reputation of the business in respect of Health, Safety & Environmental management. This policy statement sets out our commitment to this goal in all the company's activities and services.

We are actively committed to complying with both the letter and spirit of legislation and all other requirements imposed on the company by relevant regulatory and governing bodies in order to achieve the highest performance. The company's services and products must be fit for the specified purpose and conform to the company's standards, together with additional national and international specifications and standards as appropriate.

The company is committed to achieving exceptional performance and promoting a positive culture through continual improvements to the Integrated Management System. To achieve this we have established relevant objectives and targets which are communicated throughout the company and available to interested parties. The HSE Director will ensure sufficient resources are available to deliver these objectives and targets.

- The prevention of pollution through the minimisation of emissions to air, land and water
- The use of natural resources in an efficient manner including re-use and recycling
- A safe place of work including safe access and egress
- Well maintained plant, equipment and safe systems of work
- Adequate consultation, information, instruction, training and supervision
- Adequate surveillance so as to ensure the prevention of ill health
- Competent Personnel

The company will enlist the support of all employees for the implementation of this policy and will encourage open consultation to facilitate the development of the management system. We understand that employees are a key resource and that their input and understanding is vital to the implementation of a successful integrated management system. Employees are reminded they have a duty to ensure they make proper use of the systems, procedures and resources provided and that they must have due regard for the impact their activities may have on health & safety of both themselves and others, the environment and the overall quality of the service and product being provided.

The company's directors and management team give their full support to this Policy and the Integrated Management System and take direct responsibility for its execution. This policy extends to all contractors and sub-contractors engaged on our projects.

Mr. K. Anderson

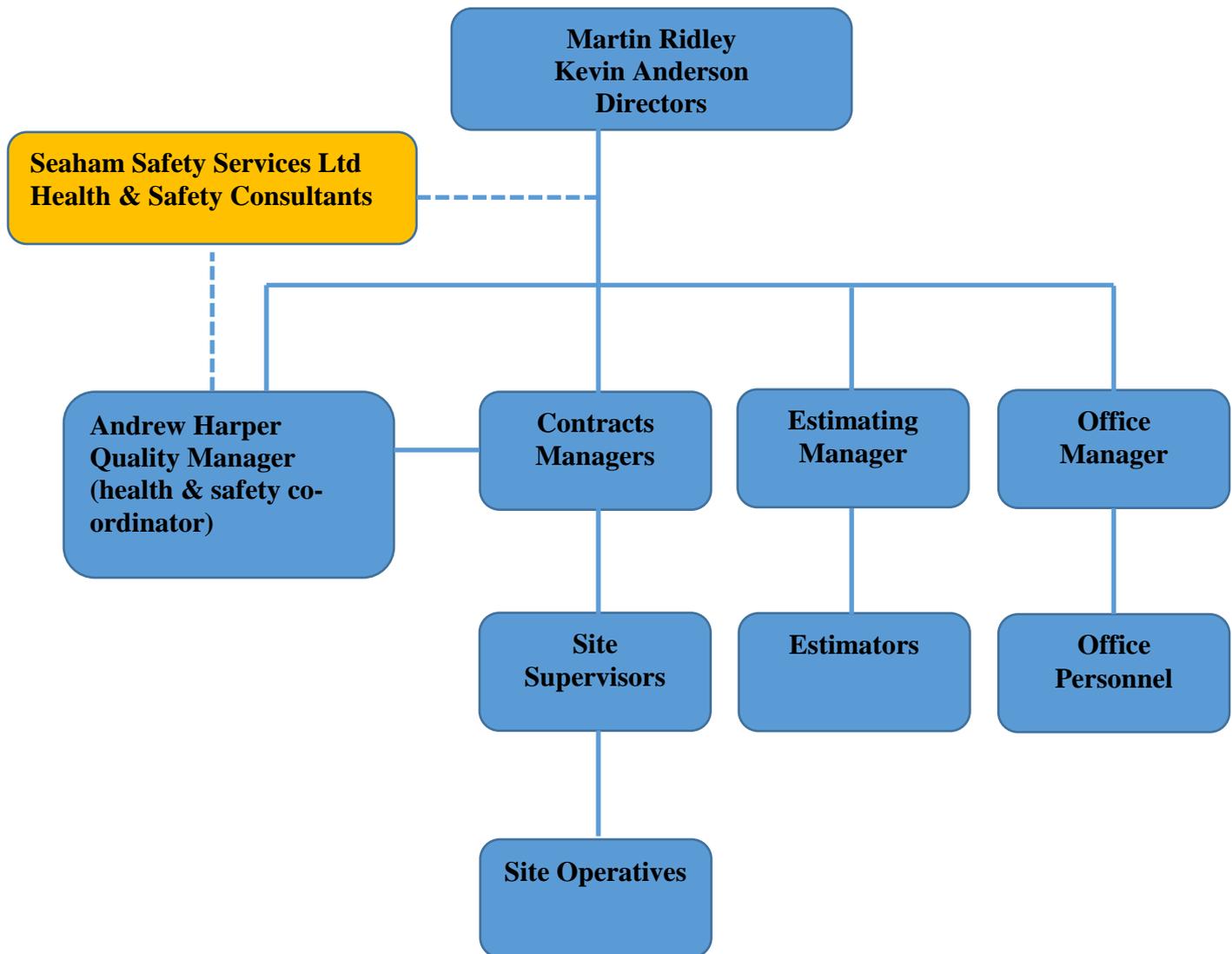
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Date: 29/02/2016

2.1.02 Organisational structure

KM Electrical Services



2.1.03 Sustainability Statement

It is our intention to demonstrate our policy by delivering sustainable solutions for our people, stakeholders, clients, the wider community and the environment in which we operate and live. We will promote best sustainable practice and where possible, exceed government and regulatory guidance. This policy reflects our commitment to ensuring that sustainability is paramount to the business.

Sustainable Communities

We will endeavour to be a good neighbour and engage with, work with, and support our local communities. We will create a workplace where our people are valued, engaged and skilled; and drive excellence in HSE matters.

Health and Safety

The way we work and behave ensures all of our employees and stakeholders are protected from the risks of occupational injury or ill health. We will attract, develop and retain the right people by becoming an employer of choice and will work in a way that supports our values and ensures equal opportunities within a diverse workforce.

Community

By engaging, respecting and understanding our community stakeholders we will make a positive contribution to their environment and quality of life.

Natural Resource Protection and Environmental Enhancement:

We will responsibly manage our impact on the environment through the prudent use of natural resources, minimising waste and by protecting and enhancing the environment in which we work and live.

Environmental impacts

We will not pollute or contaminate air, land or water and will manage our waste responsibly. We will seek to enhance and improve the environment through good design and management.

Biodiversity

We will understand and manage our biodiversity impacts and where possible, seek opportunities to enhance wildlife and habitats for the future.

Supply chain

We will work closely with our supply chain to deliver mutually sustainable solutions that deliver value for money.

Resource use

We will maximise resource efficiency in planning, design, waste minimisation and recycling.

Climate change and energy

We will endeavour to reduce our impact on climate change by minimising our use of energy.

Atmospheric impacts

We will actively reduce our use of energy and emissions of greenhouse gases in transport, design, construction, maintenance and in the operation of our facilities.

Design

Where applicable, sustainability will be a key objective of our designs. We will achieve excellence in life-cycle design and exceed customer expectations by delivering cost effective sustainable solutions.

Sustainable consumption and production

We work with our customers and supply chain to achieve *'more with less'* through more efficient use of human and material resources, considering life cycle impacts and delivering sustainable, profitable and socially beneficial outcomes.

2.1.03 Sustainability Statement (Continued)

Value and risk

We will improve our business margins and create shareholder value in a sustainable way. We will endeavour to lead the way in understanding and managing our risk profile.

Customers

The company is renowned for understanding and exceeding our customer expectations and their demand for more sustainable solutions.

2.1.04 Sustainable Procurement

Introduction

The company provides goods and services that take into account the social, economic and environmental impact that such procurement has on people and communities. Under our Integrated Management System we consider: what products are made of, where they have come from, who has made them, how they are transported and how they are eventually disposed of.

We demonstrate sound environmental management in the acquisition of goods and services so as to ensure they have the minimum impact on our environment. In this respect we are committed to:

- Raising environmental awareness.
- Reducing carbon by measuring, reporting and adopting a low carbon travel policy.
- Reducing waste and increasing the amount recycled.
- Adopting an environmentally responsible view in the way we procure goods and services.

Key Sustainable Procurement Action Areas

As part of our sustainable procurement policy, the company endeavours to:

- **Procure** Goods and services which reflect the optimum environmental impact and are clearly demonstrable within value for money
- **Promote** a level of environmental awareness amongst our supply chain and encourage them to adopt a similar strategy
- **Prohibit** the use of products or processes which are potentially damaging to the environment where a less environmentally damaging alternative is available
- **Reduce** the purchase of new products by re-using, repairing or refurbishing existing products where technically and financially viable to do so
- **Specify** products, which are made from recycled material where justifiable on economic and technical grounds
- **Specify** products, which can be recycled where it is technically and financially viable
- **Specify** products which are the most energy efficient available, both in their manufacture and operation
- **Specify** products which cause minimal damage to the environment in their manufacture, distribution, use and disposal where it is technically and financially viable.

2.1.05 Sickness and Absence Policy

Absence due to Illness

The Company will maintain records of attendance and absence of individual members of staff. It is the responsibility of employees to maintain an acceptable level of attendance and it is the responsibility of all managers to maintain, review and manage absence levels within their areas of responsibility. Managers will take appropriate steps to identify the reasons for, and so far as possible to eliminate unacceptable levels of absence within their area of responsibility.

Under no circumstances will managers put pressure on individual members of staff to work when they are unfit to do so for any reason.

In the event of your absence for whatever reason, you, should telephone your Line Manager on the first day of absence, at least 30 minutes before your start time, to inform the company of your reason for absence with an estimated return to work date. Unless you have been signed off work by your doctor, you must keep the company informed of when you are likely to return to work at least every two days.

If the absence is due to sickness, you must complete a Self-Certification Form as evidence of illness or incapacity prior to your return to work, if return to work is within 7 working days.

Employees who are unable to return to work within 7 calendar days must obtain a medical certificate from their doctor, specifying his/her incapacity and there after every fourteenth day and at the end of the sick leave. This must be completed and sent to your Manager.

Please note that any reference to work related stress will be handled by HR. It will most likely be necessary to write to your doctor to obtain a report. Once this report is received HR will meet with you to discuss the findings and the next steps.

There is an acknowledgement that it is the employer and not necessarily the doctor who may, in some circumstances, be best placed to make a decision on any recommendations made by an occupational health practitioner or a doctor in consultation with the employee to facilitate a return to work.

If however, the employer is not able to facilitate a change or an adjustment a revised statement from the doctor is not necessary, the existing statement is evidence that an individual has a health condition preventing them carrying out the current role. HR will then progress the situation accordingly with each case being individually assessed looking for a suitable solution.

On your return to work you will be asked to complete a Return to Work Interview Form with your Manager. This task may be undertaken in certain circumstances by HR.

Employees may be asked to provide written evidence of any recommendation to exercise (or other therapeutic treatment) whilst on sick leave. This can be from their GP or another specialist (medically qualified such as a physiotherapist). This report should state what exercise is recommended and why.

The company reserves the right to withhold sick pay in circumstances where the certification procedure described above has not been followed or where there is sufficient reason to doubt the validity of your sickness absence claim. In the latter circumstances, the company may request you to undergo a medical examination by a doctor selected by the company.

2.1.05 Sickness and Absence Policy (Continued)

Medical Examinations

The company reserves the right to require the submission of medical evidence for any period of absence due to ill health or incapacity where an employee has a record of absence which is unacceptable to his or her manager. In addition, the company may at any time require an employee whose absence record has given cause for concern or where there is doubt as to the reason for self certified absence, to consent to a further examination by a qualified medical practitioner nominated by the company. This is in addition to the company's right to require a medical examination in order to establish the likely future state of health or fitness for work of a staff member with longer-term health problems.

Falsification of returns of hours worked and/or attendance records are regarded by the company as gross misconduct and may accordingly lead to dismissal under the disciplinary procedure.

Sick Pay Scheme

For employees who are absent from work because of illness or injury and the absence complies with the conditions of notification of absence, the company will pay statutory sick pay in accordance with its legal obligations.

Company sick pay

Any payment above statutory sick pay will be annotated in your offer of employment or employment contract,

Frequent Absences

The prime concern of the company is to ensure the support and well being of all staff. However, in the event of 4 or more individual absences in any 12 month period (of whatever numbers of days on the occasion of each individual absence) the TRIGGER POINT, is reached.

A more detailed review of all circumstances will take place with a member of the Management and will involve HR. If the reasons for such frequent absences are found to be unsatisfactory then the company reserves the right to move to the company disciplinary procedure.

Persistent Short-Term Illness

Members of staff who are unable by reason of recurrent ill health to maintain an acceptable level of attendance or performance will be consulted, and his/her entire record of service will be taken into account. The primary criterion will not be past record alone, but whether in the light of past record and associated medical evidence, and available evidence, the member of staff will be able to maintain an acceptable level of attendance and performance.

The company reserves the right to require any member of staff whose record of attendance is unacceptable to undergo such medical examination by a medical practitioner nominated by the company as it deems necessary, and/or to submit medical certificates for all absences, and/or to furnish medical evidence of fitness to remain in employment of the kind in which s/he is currently engaged. A member of staff may be required to provide a certificate of his/her fitness to return to work as a condition of being permitted to do so.

Long-Term Illness

Employees who are on long term sick leave cannot apply to take annual leave whilst they are off sick (nor can they take this time in lieu).

2.1.06 Smoke-Free Policy

General

This policy has been developed to protect all employees, clients and visitors from exposure to secondhand smoke and to assist compliance with smoke-free legislation, including the Health Act 2006 and the Smoke Free (Signs) Regulations 2012.

Policy

It is the company policy that all of our workplaces are smoke-free and that all employees have a right to work in a smoke-free environment. Smoking is therefore prohibited in all enclosed and substantially enclosed premises and workplaces. This also includes company vehicles used by more than one person, even if they are used at different times.

The policy applies to all employees, consultants, contractors, clients, members of the public and visitors. In addition when working on behalf of the company, all employees and subcontractors are prohibited from smoking within any customer or client premises or within any place where “no smoking “ signs are displayed.

Implementation

Overall responsibility for policy implementation and review rests with the Directors. However, all employees are obliged to adhere to, and support the implementation of this policy. The policy will be drawn to the attention of all new staff members at induction.

Appropriate “no-smoking” signs will be clearly displayed at the entrances to and within the premises and the signs will comply with all legislative requirements.

Designated smoking areas

An area has been designated where staff may smoke outside and a receptacle has been provided for smoking materials. All litter including cigarette butts must be placed in the container provided. Smoking in other areas of the company’s grounds or buildings is strictly prohibited.

Non-compliance

Disciplinary procedures will be followed if employees fail to comply with this policy and those who do not comply with smoke-free law may also be liable to a fixed penalty fine and possible criminal prosecution.

2.1.07 Smoking Policy When Working in Occupied Premises

The company has a duty to provide and maintain a safe working environment which is safe and without risks to health. There is also a responsibility to conduct our activities in such a way as to ensure that persons other than our employees are not exposed to risks.

There are no requirements within current legislation for an individual not to smoke in their own home if a tradesperson is present. Therefore when employees are required to visit domestic premises as part of their duties, the company cannot control smoking on these premises, but still has a duty to our employees. In these cases, the occupier, client, company management should come to an agreement about smoking, including when and where smoking can take place, and how the service will be provided. This agreement should include requesting the premises occupier (and others present) not to smoke within the room, or rooms, where we are providing a service.

Where employees are exposed to second-hand tobacco smoke in these circumstances, they should seek advice from their line manager, who will arrange for all reasonable steps to be taken to protect employees from exposure to workplace tobacco smoke.

2.1.08 Lone working

As part of our undertakings we may require employees to carry out work in situations where they are alone. We will try to minimise these situations however on some occasions there will be no alternative solution and in these circumstances we will implement control measures.

- supervisors periodically visiting and observing people working alone;
- pre-agreed intervals of regular contact between the lone worker and supervisor, using phones, radios or email;
- manually operated or automatic warning devices which trigger if specific signals are not received periodically from the lone worker, e.g. staff security systems;
- implementing robust system to ensure a lone worker has returned to their base or home once their task is completed.

2.1.09 Display Screen Equipment

We understand that we have a legal duty to control work being carried out using display screen equipment. The safe use of such equipment is covered in The Health and Safety (Display Screen Equipment) Regulations 1992. Risk assessment will be carried out and control measures will be implemented to ensure that risks controlled.

Work stations must meet certain basic requirements that enable them to be appropriately adjusted and used without unacceptable risks to health and safety.

The company is responsible for paying for eyesight tests and a contribution towards basic spectacles if the user is identified as a DSE user, additional costs is paid by the employee.

2.1.10 Welfare

The Workplace (Health, Safety and Welfare) Regulations 1992 covers the working environment, general safety, facilities for washing, eating and changing and good housekeeping. Persons in charge of places of work will ensure that all the facilities and equipment are maintained to the required standards, through regular inspections.

2.1.11 Young Person

The Management of Health and Safety at Work Regulations 1999, require employers to protect the health and safety of children (those yet to attain school leaving age) and young persons (under the age of 18) who work for them. We understand that we must carry out specific individual risk assessment of tasks undertaken by young persons to ensure that they are not exposed to hazards which may cause harm to them.

Young persons will not be employed for work which is beyond their physical or psychological capacity; involving harmful exposure to agents which are toxic or carcinogenic, cause heritable genetic damage or harm to the unborn child or which in any other way chronically affect human health; involving harmful exposure to radiation; involving the risk of accidents due to their inexperience and physical limitations; involving extreme cold or heat; noise; or vibration.

2.1.12(1) Confrontation or Difficult Situations

In extraordinary circumstances where you are faced with situations when premises occupiers refuse not to smoke, or to stop smoking, you may decide to continue if you feel refusal may have an adverse effect, or aggravate the situation. Nevertheless, in any situation where you are at risk from an occupant unwilling to refrain from smoking, you should not challenge the occupant's smoking (in order to ease the situation) but inform your line manager before

carrying out the service. Company employees and subcontractors are not permitted to smoke in occupied premises or in void properties whilst on company business.

An element of risk may be associated with work situations which involve close social interaction between people, particularly in private settings. Depending on the particular situation, there are various components of risk involved, including physical and/or verbal threat or abuse or being in a compromising situation where there may be accusations of improper behaviour. It is essential during any involvement with the client and premises occupiers that you recognise and respect not only your own rights and responsibilities, but also the rights and responsibilities of others.

Physical violence against staff is very uncommon, but verbal abuse can happen more regularly. Either way, if an incident occurs, Supervisors will need to support staff and operatives and consider whether further action is required. There may be numerous consequences for staff following incidents of crime, violence or verbal abuse. These consequences can either affect the member of staff directly involved or those who witnessed the incident.

The support required will depend on the severity of the incident and how badly the employee is affected. Key points to remember are: Victims of aggression will be affected in different ways and differing levels of severity, therefore sensitive and appropriate support is required to reduce the suffering of the victim and employees should not be blamed for the incident.

2.1.12 (2) Dealing with the immediate aftermath of an incident

The immediate reaction following an incident of work-related violence will depend on the severity of the incident and the specific needs of the victim. If employees experience verbal abuse, it may be enough to provide friendly support and to report and record the incident. However, extreme situations will require more drastic action and involve other agencies such as the police. When in doubt, consult with your line manager for further advice.

2.1.13 Equal Opportunities, Equality and Dignity at Work Policy

The Company is committed to a policy of equal opportunities and equality in employment, not only for legal requirements, which necessitate compliance, but more importantly, the provision of equal opportunities is fundamental to the way in which we function as a business. The promotion of an effective policy fits naturally into the business environment, how we deal with our customers and our internal procedures for employees.

The Equality Act brings together and re-enforces aspects of previous legislation. The same 'groups' are covered but are now known as 'protected characteristics'.

The Company will take all reasonable steps to employ, train and promote employees on the basis of their experience, abilities and qualifications without regard to race, colour, ethnic origin, nationality, national origin, religion or belief, sex, sexual orientation, gender reassignment, age, marital or civil partnership status or disability. The Company will also take all reasonable steps to provide a work environment in which all employees are treated with respect and dignity, and that is free of harassment based upon an employee's race, colour, ethnic origin, nationality, national origin, religion or belief, sex, sexual orientation, gender reassignment, age, marital or civil partnership status or disability. The Company will not condone any form of harassment, whether engaged in by employees or by outside third parties who do business with the Company.

Employees have a duty to co-operate with the Company to ensure that this policy is effective in ensuring equal opportunities and in preventing discrimination, harassment or bullying. Action will be taken under the Company's disciplinary procedure against any employee who is found to have committed an act of improper or unlawful discrimination, harassment, bullying or intimidation. Serious breaches of this equal opportunities and dignity at work statement will be treated as potential gross misconduct and could render the employee liable to summary dismissal. Employees should also bear in mind that they can be held personally liable for any act of unlawful discrimination. Employees who commit serious acts of harassment may also be guilty of a criminal offence.

You should draw the attention of your manager to suspected discriminatory acts or practices or suspected cases of harassment. You must not victimise or retaliate against an employee who has made allegations or complaints of

discrimination or harassment or who has provided information about such discrimination or harassment. Such behaviour will be treated as potential gross misconduct in accordance with the Company's disciplinary procedure.

Policy

The Company is, therefore, committed to providing equality of opportunity for all employees by:

- Preventing any form of direct or indirect discrimination or victimisation or bullying. This includes sexual banter and offensive/suggestive comments which could be deemed harassment
- Promoting a good and harmonious working environment where all individuals are treated with respect and dignity and in which no form of intimidation or harassment and discrimination will be tolerated
- Fulfilling all legal obligations under relevant National and European Union legislation and associated Codes of Practice
- Being committed to ensuring customers are treated in a fair and equitable manner in our dealings with them and that all employees are protected from harassment and discrimination in their dealings with our customers.

Legislation

Legislation covers age, gender, marital or family status; gender reassignment; race, colour, nationality, ethnic or national origin; disability; sexual orientation, religion/belief; trade union membership or non-membership and in Northern Ireland political opinion. There are significant penalties associated with unlawful discrimination for both the organisation and the individual. All employees, therefore, have a duty and a responsibility to respect this policy and act in accordance with it. Acts which breach this policy will not be tolerated and will be regarded as misconduct, which could lead to disciplinary action being taken against the offending employee in accordance with the company's disciplinary procedure. Under equal opportunities legislation employees can be made personally liable for acts of discrimination.

If anyone believes that he/she has suffered any form of discrimination, harassment or victimisation he/she is entitled to raise the matter through the formal Grievance Procedure. Acts which breach this policy will not be tolerated and will be regarded as misconduct, which could lead to disciplinary action being taken against the offending employee in accordance with the company's disciplinary procedure.

Legislation also covers witnesses to any unacceptable act if they feel the conduct they have witnessed creates an offensive and degrading environment for them.

Discrimination

Unfair and unlawful discrimination in employment occurs as a result of prejudice, misconception and stereotyping which hinders the proper consideration of an individual's skills, abilities, potential and experience. It can be direct or indirect, intentional or unintentional.

Unlawful direct discrimination occurs when a person is treated less favourably than another on the grounds of gender or marital status; age, race, colour, nationality or ethnic or national origin or sexual orientation or religion or belief where the reason for the less favourable treatment is that he/she suffers from a disability, is pregnant or on maternity leave; and in Northern Ireland political opinion. Direct discrimination, for example, can occur where a person is refused a job, training or promotion in any of these circumstances.

For the purposes of the Disability Discrimination legislation, the definition of 'disability' is far wider than what may be expected of preconceived notions of disability in common parlance. In terms of the Disability Discrimination Act, an employee may be disabled if he/she suffers from a physical or mental impairment, which has a substantial and long-term adverse effect on his/her ability to carry out, normal day-to-day activities. The following have been held to amount to a 'disability': agoraphobia, ME, HIV, anxiety and depression, schizophrenia and learning disability.

Disability Discrimination occurs when an individual is unjustifiably disadvantaged in employment or recruitment for a reason connected with his or her disability unless the discrimination can not be avoided, by making reasonable adjustments. For example - failure to recruit a wheelchair user, without first considering whether the working arrangements or premises can reasonably be adapted to the individual's needs.

Unlawful indirect discrimination occurs when a condition or requirement is applied to all people, but which in practice is such that fewer people in certain groups are able to comply and it can not be shown to be justifiable. Some practices may look fair, but have unintended discriminatory effects.

Indirect discrimination on the grounds of race can occur for example, where a company makes a GCSE or Higher Grade English qualification a requirement as a selection criterion. This would have a disparately adverse impact on people educated overseas and may not be justified if all that is required for the job is to demonstrate a level of literacy.

Victimisation can occur when a person is treated less favourably than another, because he/she has brought proceedings, given evidence or complained about the behaviour of someone who has been discriminating against him/her or harassing him/her or others. Victimisation itself can be unlawful.

Associative Discrimination

It is forbidden to discriminate against someone because they associate with someone who has a protected characteristic. This includes race; religion or belief; sexual orientation; age; disability; gender reassignment and sex.

Perceptive Discrimination

It is forbidden to discriminate against a person because you or one of your colleagues thinks they have a protected characteristic. This includes race; religion or belief; sexual orientation; age; disability; gender reassignment and sex.

Indirect Discrimination

It is forbidden to have a rule, policy or practice which applies to all employees but particularly disadvantages people who share a protected characteristic. This is opposed to direct discrimination where someone is treated less favourably because they have or are thought to have a protected characteristic. This includes race, colour, ethnic origin, nationality, national origin, religion or belief, sex, sexual orientation, gender reassignment, age, marital or civil partnership status or disability.

Third Party Harassment

Any harassment is forbidden even if caused by individuals who are not employees of the Company, but only if it has occurred on at least two previous occasions.

Disability

It is forbidden to treat a person unfavourably because of something connected with the disability e.g. spelling mistakes due to dyslexia. It is now unlawful to ask after the health of an employee or candidate unless certain circumstances are present.

Gender Reassignment

There is protection for transsexual people and the individual is no longer required to be under medical supervision to be protected. Transgender people such as cross-dressers who are not transsexual are not protected.

Equal Pay

It is unlawful to not pay the same rate for the same work.

Pay Secrecy

It is unlawful to prevent or restrict an employee establishing if pay differences do exist.

Equal Opportunities Awareness

There are significant penalties associated with unlawful discrimination for both the Employee and the Company. The excuse of 'not knowing' about the legislation is not an acceptable defence; therefore, it is important that we are all aware of our responsibilities in this regard. It is up to each of us, and particularly management, to promote self-awareness and to cultivate the appropriate business behaviours amongst employees who report to them.

It is important that we do not allow unfair or unjustified assumptions about specific groups of people to influence our behaviour and interactions in the workplace.

Recruitment, Advertising and Selection

The recruitment process will be conducted in such a way as to result in the selection of the most suitable person for the job in terms of relevant experience, abilities and qualifications. The Company is committed to applying its Equal Opportunities Policy Statement at all stages of recruitment and selection.

Advertisements will encourage applications from all suitably qualified and experienced people. When advertising job vacancies, in order to attract applications from all sections of the community, the Company will, as far as reasonably practicable:

- Ensure advertisements are not confined to those publications which would exclude or disproportionately reduce the numbers of applicants of a particular gender, sexual orientation, age, religion or racial group
- Avoid prescribing any unnecessary requirements which would exclude a higher proportion of a particular gender, sexual orientation, age, religion or racial group or which would exclude disabled job applicants
- Avoid prescribing any requirements as to marital or civil partnership status
- Where vacancies may be filled by promotion or transfer, they will be published to all eligible employees in such a way that they do not restrict applications from employees of any particular gender, sexual orientation, age, religion or racial group or from employees with a disability.

The selection process will be carried out consistently for all jobs at all levels. All applications will be processed in the same way. The staff responsible for short-listing, interviewing and selecting candidates will be clearly informed of the selection criteria and of the need for their consistent application. Person specifications and job descriptions will be limited to those requirements that are necessary for the effective performance of the job. Wherever possible, all applicants will be interviewed by at least two interviewers and all questions asked of the applicants will relate to the requirements of the job. The selection of new staff will be based on the job requirements and the individual's suitability and ability to do, or to train for, the job in question.

With disabled job applicants, the Company will have regard to its duty to make reasonable adjustments to work provisions, criteria and practices or to work premises in order to ensure that the disabled person is not placed at a substantial disadvantage in comparison with persons who are not disabled.

If it is necessary to assess whether personal circumstances will affect the performance of the job (for example, if the job involves unsociable hours or extensive travel), this will be discussed objectively, without detailed questions based on assumptions about race, colour, ethnic origin, nationality, national origin, religion or belief, sex, sexual orientation, gender reassignment, age, marital or civil partnership status, disability, children and/or domestic obligations.

Training and Promotion

The Company will train all managers in the Company's policy on equal opportunities and in helping them to identify discriminatory acts or practices or acts of harassment or bullying. Managers will be responsible for ensuring they actively promote equal opportunity within the departments for which they are responsible.

The Company will also provide training/guidance to all employees to help them understand their rights and responsibilities in relation to dignity at work and what they can do to create a work environment that is free of bullying and harassment.

Where a promotional system is in operation, it will not be discriminatory and it will be checked from time to time to assess how it is working in practice. When a group of workers predominantly of one race, religion, sex, sexual orientation or age group or a worker with a disability appears to be excluded from access to promotion, transfer and training, and to other benefits, the promotional system will be reviewed to ensure there is no unlawful discrimination.

Terms of Employment, Benefits, Facilities and Services

All terms of employment, benefits, facilities and services will be reviewed from time to time, in order to ensure that there is no unlawful discrimination on the grounds of race, colour, ethnic origin, nationality, national origin, religion or belief, sex, sexual orientation, gender reassignment, age, marital or civil partnership status or disability.

Equal Pay

The Company is committed to equal pay in employment. It believes its male and female employees should receive equal pay for like work, work rated as equivalent or work of equal value. In order to achieve this, the Company will endeavour to maintain a pay system that is transparent, free from bias and based on objective criteria.

2.1.14 Alcohol and Drugs Policy

Alcohol and drug misuse or abuse can be a serious problem within the workplace. Employees who drink excessively or take unlawful drugs are more likely to work inefficiently, be absent from work, have work accidents and endanger their colleagues. The Company has a duty to protect the health, safety and welfare of all its employees. However, the Company recognises that, for a number of reasons, employees could develop alcohol or drug related problems. In relation to drugs, these rules apply to those that are unlawful under the criminal law and not to prescribed medication. These rules aim to promote a responsible attitude to drink and drugs and to offer assistance to employees who may need it.

Prohibition on Alcohol and Drug Consumption in the Workplace

No alcohol or drugs must be brought onto or consumed on Company premises at any time without the permission of the Directors. Staff must never drink alcohol or take drugs if they are required to drive private or Company vehicles on Company business. Staff must also not drink alcohol or take drugs when they are on operational standby or on call.

Because of the high risk environment of construction the company reserves the right to ask any member of staff to leave work if they present themselves in a state that leads their line manager to conclude that they may still be under the influence of alcohol/drugs from the evening before. This will be considered to be at the least misconduct and serious breaches may be considered gross misconduct. This period of leave will be unpaid.

Social drinking after normal working hours and away from the Company's premises is, of course, generally a personal matter and does not directly concern the Company. The Company's concern only arises when, because of the pattern or amount of drink involved, the employee's attendance, work performance or conduct at work deteriorates.

A breach of these provisions is a disciplinary offence and will be dealt with in accordance with the Company's disciplinary procedure. Depending on the seriousness of the offence, it may amount to gross misconduct and could result in the employee's summary dismissal.

Alcohol and Drug Related Misconduct

Whilst these rules are aimed at assisting employees with alcohol or drug problems, action will nevertheless be taken under the Company's disciplinary procedure if misconduct takes place at work as a result of drinking or taking drugs, or if an employee is found to be under the influence of alcohol or drugs whilst at work. Even a small amount of alcohol can affect work performance and, if an employee is found under the influence of alcohol whilst at work, there could be serious health and safety consequences. The same applies to being under the influence of drugs. Incapacity or misconduct caused by an excess of alcohol or drugs at work is a potential gross misconduct offence under the Company's disciplinary procedure and the employee is therefore liable to be summarily dismissed. This also applies to any employee believed to be buying or selling drugs or in possession of or taking drugs on the Company's premises.

The Company reserves the right in any of these circumstances to arrange for the employee to be escorted from the Company's premises immediately and sent home without pay for the rest of the day or shift.

Alcohol and Drug Testing

On the grounds of protecting health and safety and only where necessary to achieve a legitimate business aim, the Company reserves the right to carry out random alcohol and drug screening tests on those employees in the workplace whose activities and job duties have a significant impact on the health and safety of others. If an employee receives a positive test result, this will be viewed as a potential gross misconduct offence and renders the employee

liable to summary dismissal in accordance with the Company's disciplinary procedure. Unreasonable refusal to submit to an alcohol or drug-screening test will also be dealt with through the disciplinary procedure.

2.1.15 Mobile Phones Policy

Using Your Mobile Telephone Whilst Driving

It is a criminal offence for anyone to drive a motor vehicle while using a hand-held phone or similar device. Therefore no employee of the Company must take or make phone calls whilst driving unless they are using an installed hands free kit in the car. You must not use your phone unless you are safely parked with the engine turned off.

Any breach of this new legislation could result in not only a fixed penalty fine but a larger fine for drivers of a bus, coach or van as well as penalty points. The Company will not be held liable for the payment of these fines or the penalty points and reserves the right to deduct such fines from an employee's salary.

Personal Mobile Telephones at Work

In some incidences, for health & safety reasons, it is forbidden for staff to have their mobile 'phones on 'active use' during working hours – you will be advised if this relates to your role. If there is a need in the case of a family emergency then permission MUST be obtained from your manager. This also includes text messaging.

2.1.16 Training and Information

Sufficient and appropriate training is the key to the efficient operation of the company. We do not view health and safety training as an activity undertaken just to meet the minimum requirements of health and safety law, nor as a 'bolt-on' extra to skill or professional training, but as an integrated part of general skill training, for the correct undertaking of any work activity.

The company has therefore set out its aims to training as follows:

- a) Training that is both suitable and sufficient and cost effective.

The cost of training and the degree of risk to be countered by the training will be taken into account when deciding if the training is justified.

- b) Training will be prioritised to ensure that training, information and instruction for high-risk activities and emergency procedures is undertaken before general skill training.

The company objective is to ensure that all employees can carry out their duties with the least chance of harm occurring either to themselves or to others; or causing damage to property.

- c) The more information, instruction and training received by the employee, the greater their level of competence and therefore the greater the opportunity to act as supervisors of their own work.

The company maintains detailed records of all training and monthly training meetings are held. Annual reviews of training needs are undertaken, from which training plans are developed.

Reasonable enquiries are made of contractors' and their employees' level of training, to ensure appropriate general safety awareness and competence. The company will advise contractors, if necessary, on training requirements where awareness or training is deemed to be lacking.

2.1.17 Business Ethics

Introduction

Ethical behaviour underpins the way we do business and treat one other. Our values determine our behaviour and we support and uphold them so that they are an integral part of the company's day to day operations. This policy aims to



guide the actions of our stakeholders, to encourage a way of working which is honest, responsible, respectful and generates trust.

Purpose

To ensure there is clarity in what is expected of each and every one of us in terms of ethical behaviour.

Scope

This policy applies to all company employees and all of our stakeholders.

Policy and Procedures

Every employee must:

- Treat everyone with dignity and respect and listen carefully to our customers and other stakeholders.
- Treat the company's assets and equipment as you would your own.
- Operate within the letter and the spirit of the law.

The company is committed to achieving the highest standards of corporate responsibility in all our business dealings and relationships. This is underpinned by a number of associated policies and statements guiding the way we behave, including:

- Fraud, Bribery and Corruption Policy
- Hospitality and Gifts
- Equality and Diversity Policy
- Sustainability
- Whistle-blowing
- Social Media Policy

Compliance

In establishing whether or not any conduct or activity is in contravention of this policy, ask yourself:

- Is it legal?
- Is it in breach of this or any other policies?
- Could it be perceived as bringing you, your colleagues, the company or any of our stakeholders into disrepute?
- Could it be perceived as compromising you, your colleagues, the company or any of our stakeholders?
- Could it be considered by the public as ethical, appropriate and acceptable?

If you are in any doubt, stop and contact your line manager. Contravention of this policy could lead to disciplinary action.

2.1.18 Community Statement

Sustainability is a key priority for the company and this statement supports the company's Sustainability and Environmental Policies. The statement describes our responsibility towards the communities in which we work.

These communities are important to us therefore we are committed to enhancing the environment and communities in which we work. We endeavour to make a real and lasting contribution by promoting best practice in sustainability and exceeding industry and regulatory guidelines. We will focus on the areas where we can contribute most, using our knowledge and expertise, reflecting the priorities of our stakeholders.

We will enable our employees to participate in community activities as part of our company development programmes and voluntary work and actively encourage our partners and stakeholders to join us.

To achieve our policy we focus our efforts on engagement:

- Of the workforce of the future.
- To support community improvement.
- Focused on employment and training.

- To enhance employee morale.
- As a good neighbour.

Policy Delivery

Our policy is delivered by generating a culture that actively encourages best sustainable practices and the real involvement of our employees, supply chain and stakeholders.

2.1.19 IT, Email, Internet and Social Media Policy

The Company will comply with all laws that regulate the use of computers, data protection and confidentiality. This policy relates to the Company/Customers/Clients. You are expected to assist in ensuring that the Company complies with its legal duties. Please note this list is not exhaustive.

The Company has the right to monitor any and all aspects of the use of the facilities that are made available to employees and temporary personnel and to monitor, intercept and/or record any communications made by using the facilities. This is to ensure compliance with this policy or for any other purpose authorised under the Telecommunications (Lawful Business Practice) (Interception of Communications) Regulations 2000. By using the facilities you consent voluntarily and knowingly to your use being monitored. You also acknowledge the right of the Company to conduct such monitoring.

The purposes for such monitoring are:

- to promote productivity and efficiency
- for security reasons
- to ensure there is no unauthorised use of the Company's time e.g. that an employee has not been using e-mail to send or receive an excessive number of personal communications
- to ensure the smooth running of the business if the employee is absent for any reason and communications need to be checked
- to ensure that all employees are treated with respect, by discovering and eliminating any material that is capable of amounting to unlawful harassment

The following rules apply:

- The Company's computers email and internet facilities are provided for the performance of your job – this includes email and internet facilities which are accessible by using a mobile device such as a Company mobile phone. You must not use any information, data or software held on the computers for any other purpose. Those employees who are provided with email or internet access including access using mobile phones or other devices must not over use the facilities for personal purposes. Personal use can only be in your own time such as breaks. It is forbidden to use the facilities for playing games or accessing social networking sites in work time. Please note the Company may be forced to place restrictions on accessing social networking sites if this policy is abused.
- You are not permitted to discuss any matters relating to your employment or disclose any information about the Company, its employees, customers or clients on any social networking site such as Facebook, Bebo, Twitter etc. This rule applies both during working hours and outside work.
- Vandalism of, or otherwise intentionally interfering with, the Company's computers will not be tolerated. The term 'computer' is also deemed to include peripheral devices such as printers, storage drives, mobile devices and scanners.
- You are responsible for making sure that any faults or problems that occur whilst you are using the Company's computers are reported to Management.
- If you have access to confidential information and/or data on the Company's computers, you must ensure that such information and/or data remains confidential and is secure.

- If you have been issued with a password that gives you access to the Company's computers or any part of those computers' systems, you must keep the password confidential. It may only be given to another person with the written permission of Management.
- Unless you have the written permission of Management, you are not permitted to make or distribute copies of any software on the Company's computers, particularly when copying such software will amount to a breach of copyright.

The following rules apply:

- You may make copies of information or data held on the Company's computers for back up purposes only. If you wish to transfer this information or data to another computer that does not belong to the Company, for example, so that you can work on your home computer, you will need the written permission of Management.
- You may only load on to the Company's computers software authorised in writing by Management and or IT Department. If you load unauthorised software on to any computer operated by the Company, you will commit a disciplinary offence and be subject to the Company's Disciplinary Procedure. This may result in your dismissal.

In respect of sending/receiving emails:

- The Company has an e-mail system, which is intended to promote the Company's business by making communication more effective. The Company may be liable if you misuse the system by, for example, sending other people either inside or outside the Company defamatory messages. The e-mail system is not meant for personal email messages and they should be kept to a minimum.
- If you use inappropriate language, which may include malicious gossip, messages that amount to a breach of the Company's equal opportunities policies or be otherwise inappropriate, this will be treated as a disciplinary offence and be treated in accordance with the Company's Disciplinary Procedure. You may be dismissed as a result of such disciplinary action. In certain cases, you may commit a criminal offence if you send inappropriate messages.
- Any e-mails that you send through the Company's computer systems are the Company's intellectual property. The Company shall have the right to retrieve all e-mails for any reasons that it deems appropriate. The Company shall also have the right to monitor all use of its computer systems without informing you. You agree that these provisions do not infringe any rights that you may have under the Human Rights Act 1998 or any legislation that amends or replaces the Human Rights Act.
- If you receive an e-mail that was not meant for you, you should immediately notify the sender. If you receive an e-mail that has inappropriate contents, you should notify Management immediately.
- If you deliberately or knowingly misuse the Company's e-mail system, the Company may consider this to be gross misconduct. The Company will not tolerate the sending of e-mails that are malicious, untrue, obscene, defamatory or in any way offensive.
- Communications of a sensitive or confidential nature should not be sent by e-mail because it is not guaranteed to be private - when monitoring e-mails, the Company will, except in exceptional circumstances, confine itself to looking at the address and heading of the e-mails. However, where circumstances warrant it, the Company may open e-mails and access the content. In this case, the Company will avoid, if possible, opening e-mails clearly marked as private or personal.
- The Company reserves the right to deny or remove e-mail or internet access to or from any employee.
- You should delete any e-mail messages sent or received that no longer require action or are no longer relevant. You should make hard copies of any information that you need to retain for record-keeping purposes.
- Please note the potential risk of being black listed for sending bulk emails. Before doing this please consult IT

The facilities should NOT be used for:

- Personal business interests.

- Taking part in MSN messaging (either sending or receiving) or other social networks such as friends reunited, MySpace, Face book, twitter, bebo etc. UNLESS it is for work related purposes or in own time (breaks etc)
- External job searches.
- Taking part in external surveys or chain e-mail.
- Conducting trivial debates.
- Expressing views or opinions about the Company, other employees or customers/clients of the Company.

The facilities should NOT be used for:

- Distributing anything created by other people without their prior approval.
- Downloading unacceptable material such as 'porn'. If you access, download, distribute, view or send pornographic and/or other offensive/damaging material from the internet it will be regarded as gross misconduct which could result in summary dismissal.
- Taking part in 'on line' gambling/gaming web sites.

Please make Management aware immediately if you receive any suspect documents, e-mail messages or computer virus alerts. Do not open attachments to any e-mail message whose address you do not recognise. Do not forward them to any other internal or external user without the approval of your Line Manager.

Social Media

- The company acknowledge that this is an area that a lot of people use to express views and ideas. (Please refer to the list above)
- It is not to be used to slander the company or pass comment on colleagues in a public forum. The Company reserve the right to take appropriate action if this policy is breached.
- For health and safety reasons it is forbidden for operative staff to use their mobile phones whilst on site. For office bases staff the company expect you will not enter into any social media sites whilst at work. Reasonable use in own time is permitted (breaks etc)

INAPPROPRIATE USE OF THE COMPUTERS, E-MAIL AND THE INTERNET SYSTEM MAY LEAD TO DISCIPLINARY ACTION UP TO AND INCLUDING DISMISSAL.

2.1.20 Stress

We understand that we have a duty to protect all employees from situations where the organisation undertakings may pose a health and safety risk due to workplace stress. In order to control workplace stress we will implement the following control measures.

- Assessing the risks to the health and safety of all employees and of anyone else who may be affected from our undertaking.
- Identifying control measures which are reasonably practicable in order to eliminate hazards or where this is not possible reducing the risk of the hazard being realized to an acceptable level.
- Ensuring that the control measures identified in the risk assessment are implemented prior to authorising the commencement of works.
- Monitoring control measures to ensure that they remain implemented and are suitable and sufficient at all times.
- Providing suitable and sufficient information, instruction and training to all persons who might be affected.

- Ensuring workloads are not excessive.
- Ensuring that employees are provided with any counseling and Occupational Health Practitioner facilities when necessary.

2.1.21 First Aid

We understand that we must ensure adequate arrangements are provided for dealing with emergency situations that require first aid. First Aid arrangements will be provided and maintained to the requirements of the Health and Safety (First Aid) Regulations 1981.

- Assessing all work places under our control to determine the number and types of first aiders and first aid equipment required taking into account annual leave and sickness cover.
- Identifying control measures which are reasonably practicable in order to eliminate hazards or where this is not possible reducing the risk of the hazard being realized to an acceptable level.
- Ensuring that the control measures identified in the risk assessment are implemented prior to authorising the commencement of works.
- Monitoring control measures to ensure that they remain implemented and are suitable and sufficient at all times.
- Providing suitable and sufficient information, instruction and training to all persons who might be affected. Personnel will be informed about first aid arrangements at their induction.
- First aid kits will be provided appropriate to the number of employees, organisation operations and working environment.
- The accident book will be kept in the head office and completed accident forms will be secured for data protection.
- Only first aiders will provide treatment and advice regarding any further treatment necessary.
- In all cases the first aider will assume the role of incident controller and will summon emergency services if required.
- Persons using first aid equipment must inform their manager or supervisor who must arrange for the equipment to be replaced. The organisation will arrange for first aid kits to be inspected to ensure that any used items are replaced.

2.1.22 Accident reporting and investigation

We understand that we have a legal duty to record accidents and report them to RIDDOR in accordance with the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995. We also recognise the importance of investigating accidents and incidents to prevent reoccurrences or more serious accidents being realized.

You must keep a record of any:

- accident, occupational disease or dangerous occurrence which requires reporting under RIDDOR

- any other occupational accident causing injuries that result in a worker being away from work or incapacitated for more than three consecutive days (not counting the day of the accident but including any weekends or other rest days). You do not have to report over-three-day injuries, unless the incapacitation period goes on to exceed seven days.

2.1.23 Personal Protective Equipment (PPE)

As part of our undertakings we may require employees to wear Personal Protective Equipment as a control measure to reduce the risk of a hazard being realised. PPE must only be considered as a last resort if existing control measures cannot eliminate hazards or minimise the risk to an acceptable level. Where it has been established that PPE is necessary it will be implemented in compliance with the Personal Protective Equipment at Work (PPE) Regulations 2002.

2.1.24 Contractors

In this Health and Safety Policy, Contractors are any firm or organisation who are employed by the Organisation. This is different to labour only contractors who are classed as employees for the purpose of Health & Safety.

- Ensure that contractors are made aware of and comply with this health and safety policy.
- Ensure that contractors carry out risk assessments and provide copies to the organisation to be vetted and approved.
- Ensure that maintenance work is carried out by competent contractors approved by the organisation.
- Ensure that contractors carrying out work are competent and approved by the organisation.
- Ensure that all work equipment is safe and in good working condition, fitted with any necessary guards and safety devices, and with any necessary certificates available for checking.
- Work is carried out permit to work.
- Inform contractor of any hazards and associated risks to which they may be exposed and the control measures implemented.
- Ensure that contractors wear personal protective equipment in accordance with risk assessments.
- Ensure that contractors provide information and instruction to all persons who may be affected by the work being undertaken.
- Ensure that all work is carried out in accordance with the relevant statutory provisions taking into account the safety of others.
- Contractors must comply with any safety instruction given to them by the organisation.
- Any accident or incident must be reported immediately to the organisation.